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April 22, 2022

VIA ECF

Hon. Jose R. Almonte
United States Magistrate Judge
Martin Luther King Building
& U.S. Courthouse
50 Walnut Street
Newark, NJ 07102

RE: *Zeo Health Ltd., et al. v. Zoi Global, LLC, et al.*, No. 2:21-cv-11410-ES-JRA:
Request to Extend Deadline to Raise Unresolved Discovery Disputes

Dear Judge Almonte:

We represent Plaintiffs Zeo Health Ltd., Micah Portney, Touchstone Essentials, Inc., and Norwood E. Stone ("Plaintiffs") in the above-captioned matter. Plaintiffs respectfully write to request that the Court extend the deadline to raise unresolved discovery disputes with the Court from April 29, 2022, as set out in the Court's Pretrial Schedule Order entered on December 28, 2021, to May 27, 2022. *See* Dkt. No. 31 ¶ 7.

The parties are in the process of gathering documents for production but have not exchanged any documents as of yet. Further, the parties have agreed on a proposed protective order that will be submitted to the Court next week. Additionally, a key Defendant in this case, Zoi Global, LLC, was just served on April 21, 2022. For these reasons, it is unlikely that the parties will be in a position to determine if there is a discovery dispute before the April 29th deadline and Plaintiff respectfully requests that the deadline be extended so that the Court can assist in resolving any disputes should they arise.

Plaintiffs asked Defendants if they would stipulate to the request for an extension but they have not responded.

Sincerely,

/s/Dariusz Keyhani
Dariusz Keyhani
Keyhani LLC
Attorneys for Plaintiff

cc: Defendants' counsel of record via ECF